

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION

No. 3:16-md-02738-MAS-RLS

**NOTICE OF DEFENDANTS JOHNSON & JOHNSON AND LLT
MANAGEMENT, LLC'S OBJECTIONS TO THE SPECIAL MASTER'S
ORDER ON DEFENDANTS' MOTION TO COMPEL MR. HESS'S
DEPOSITION TESTIMONY**

PLEASE TAKE NOTICE that on August 20, 2024, the undersigned counsel will bring Defendants Johnson & Johnson and LLT Management, LLC's ("Defendants") Objections to the August 6, 2024, Special Master Order No. 26 (Addressing a Motion to Compel) (ECF No. 33067) before this Court. For the reasons explained in the Objections filed herewith, Defendants will ask for an order (1) vacating Special Master Order No. 26 (ECF No. 33067), and (2) granting Defendants' motion to compel.

PLEASE TAKE FURTHER NOTICE that in support of their motion, Defendants shall rely upon the Objections submitted herewith, the Declaration of Matthew L. Bush, Esq., together with exhibits, and any reply submissions made hereafter; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted
herewith; and

PLEASE TAKE FURTHER NOTICE THAT oral argument is requested.

Dated: August 20, 2024

Respectfully submitted,

/s/ Kristen R. Fournier

Kristen R. Fournier
KING & SPALDING LLP
1185 Avenue of the Americas
34th Floor
New York, NY 10036
(212) 556-2100
kfournier@kslaw.com

Susan M. Sharko
**FAEGRE DRINKER BIDDLE &
REATH LLP**
600 Campus Drive
Florham Park, NJ 07932
susan.sharko@faegredrinker.com

*Attorneys for Defendants Johnson &
Johnson and LLT Management, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2024, I electronically filed the foregoing document with the clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Kristen R. Fournier

Kristen R. Fournier